Case 2:21-cr-00179-TLN Document 23 Filed 03/29/22 Page 1 of 3

HEATHER E. WILLIAMS, #122664 Federal Defender NOA E. OREN, #297100 Assistant Federal Defender Designated Counsel for Service 801 I Street, 3rd Floor Sacramento, California 95814 Telephone: (916) 498-5700/Facsimile: (Noa Oren@fd.org	916) 498-5710
Attorney for Defendant ANGEL SANTIAGO RIVERA	
	CD CT ATEC DICTRICT COLUDT
IN THE UNITED STATES DISTRICT COURT	
FOR THE EASTE	ERN DISTRICT OF CALIFORNIA
UNITED STATES OF AMERICA,) Case No. 2:21-CR-00179-TLN
Plaintiff, v.) STIPULATION AND ORDER TO CONTINUE STATUS CONFERENCE
ANGEL SANTIAGO RIVERA) Date: March 31, 2022
Defendant.) Time: 9:30 a.m.) Judge: Troy L. Nunley

Attorney, through James Conolly, Assistant United States Attorney and attorney for Plaintiff, and Heather Williams, Federal Defender, through Assistant Federal Defender, Noa E. Oren, that the status conference for March 31, 2022 be continued to May 12, 2022 at 9:30 a.m.

The reason for this continuance is to allow defense counsel additional time to review, discovery, to continue investigating avenues for mitigation and to negotiate a possible pre-trial resolution.

Based upon the foregoing, the parties agree time under the Speedy Trial Act should be excluded from the date of the parties stipulation through and including May 12, 2022; pursuant to 18 U.S.C.§3161 (h)(7)(A)and (B)(iv)[reasonable time to prepare] and General Order 479, Local Code T4 based upon continuity of counsel and defense preparation.

18

19

20

21

22

23

24

25

26

27

28

Case 2:21-cr-00179-TLN Document 23 Filed 03/29/22 Page 2 of 3

1	Counsel and the defendants also agree that the ends of justice served by the Court	
2	granting this continuance outweigh the best interests of the public and the defendants in a speedy	
3	trial.	
4		Respectfully submitted,
5	DATED: March 29, 2022	HEATHER E. WILLIAMS Federal Defender
6		/s/ Noa E. Oren
7		NOA E. OREN
8		Assistant Federal Defender Attorney for Defendant
9		ANGEL SANTIAGO RIVERA
10	DATED M. 1.20.2022	
11	DATED: March 29, 2022	PHILLIP TALBERT United States Attorney
12		/s/ James Conolly
13		JAMES CONOLLY
14		Assistant United States Attorney Attorney for Plaintiff
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		
I	Stipulation and Order to Continue Status	-2- United States v. Santiago Rivera, 2:21-CR-179-

<u>ORDER</u>

The Court, having received, read, and considered the stipulation of the parties, and good cause appearing, adopts the stipulation in its entirety as its order. The Court specifically finds that the failure to grant a continuance in this case would deny defense counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court finds that the ends of justice served by granting the continuance outweigh the best interests of the public and defendants in a speedy trial.

The Court orders the status conference scheduled for March 31, 2022 be continued to May 12, 2022 at 9:30 a.m. The Court orders the time from the date of the parties stipulation, up to and including May 12, 2022, excluded from computation of time within which the trial of this case must commence under the Speedy Trial Act, pursuant to 18 U.S.C. §§3161(h)(7), and Local Code T4.

DATED: March 29, 2022

Troy L. Nunley

United States District Judge